REMARKS

- Claims 1 to 24 and 26 to 42 are currently pending in this application
- Claim 25 was canceled by an earlier response
- Claim 1 has been amended by this response
- Claim 1 is the only pending independent claim

A. Rejections under 35 USC 112, second paragraph

Claim 26 stands rejected under 35 USC 112, second paragraph as having insufficient antecedent basis for the limitation "said nitrogen gas stream." Applicant has amended Claim 1 to address this rejection.

Applicant has amended independent Claim 1 from which claim 26 ultimately depends to recite in part "using a <u>nitrogen</u> gas stream." Applicant believes the amendment to Claim 1 alleviates any antecedent basis insufficiencies and respectfully requests reconsideration and withdrawal of the 35 USC 112, second paragraph rejection of Claim 26.

B. Rejections under 35 USC 103(a)

1. Claims 1, 6 to 24 and 26 to 42

Claims 1, 6 to 24 and 26 to 42 stand rejected under 35 USC 103(a) as being unpatentable over *Tan* (WO 02/15255 A1) in view of U.S. Patent No. 6,488,037 by *Guldi* (herein referred to as "*Guldi*"). Applicant amends claim 1.

The Applicant strongly disagrees with the Examiner's characterizations of *Guildi's* "bubbling" relative to Applicant's "purging". However, in the interest of expediting allowance of the claims, and only for that reason, Applicant has herein amended Claim 1 to include "wherein purging the at least one opening within each of the silicon carbide materials prevents

the migration of the aqueous solution of inorganic acid to a base material."

Support for the amendment may be found, for example, on page 11 lines 3 to 17 of Applicant's specification. The purging concept is further illustrated in Figure 6 of the application where a Silicon Carbide face of a showerhead 620 is immersed in an aqueous solution and a nitrogen stream 612 is fed from the backside to prevent the aqueous solution from traversing through the showerhead holes to the showerhead base 602 made of another material. By preventing the aqueous solution from migrating through the holes and contacting the base, a detrimental chemical reaction between the base and the solution is avoided. (See page 11 lines 3 to 17). Therefore, Applicant's **purging inhibits** the chemical bath.

In complete contrast, *Guldi's* **bubbling enhances** and "improves the efficacy of the chemical bath" (col 1. lines 66 – 67) by providing "a physical action in the chemical bath to dislodge particulate and film residue from an article being cleaned" (col. 2 lines 4 to 6). Consequently, Applicant asserts that purging and bubbling are not only different actions, but actions which have the complete opposite effect on the items being cleaned (inhibiting versus enhancing chemical bath, respectively). Therefore, even without amending claim 1, the *Guldi* and *Tan* cited references do not teach or suggest all of the elements of claim 1.

With the currently amended claim 1, the differences between *Guldi* and Applicant's invention are further amplified. The combination of the *Tan* and *Guldi* cited references does not teach or suggest that purging at least one opening within each of the silicon carbide materials prevents the migration of the aqueous solution of inorganic acid to a base material.

Therefore, Applicant respectfully requests reconsideration and withdrawal of the 103(a) rejection and assert that claim 1 and its dependent claims are in condition for allowance.

2. Claims 2 & 3

Claims 2 & 3 stand rejected under 35 U.S.C. 103(a) as being unpatentable over *Tan* (WO 02/15255 A1) in view of U.S. Patent No. 6,488,037 by *Guldi* (herein referred to as *"Guldi"*) as applied to claims 1, 6 to 21, and 27 to 42 above, and further in view of Applicant's so-called admitted prior art (AAPA). Applicant has amended claim 1.

Claims 2 & 3 ultimately depend from claim 1. As explained above, Applicant asserts that claim 1 is patentable over *Tan* in view of *Guldi*. Applicant asserts that the AAPA does not remedy the deficiencies of the *Tan* and *Guldi* cited references. Namely, AAPA does not disclose or suggest purging the at least one opening within each of the silicon carbide materials prevents the migration of the aqueous solution of inorganic acid to a base material. Consequently, Applicant asserts that claims 2 – 3 are allowable for at least the reasons given for patentability of claim 1.

3. Claims 4 & 5

Claims 4 & 5 stand rejected under 35 U.S.C. 103(a) as being unpatentable over *Tan* (WO 02/15255 A1) in view of U.S. Patent No. 6,488,037 by *Guldi* (herein referred to as *"Guldi"*) as applied to claims 1, 6 to 21, and 27 to 42 above, and further in view of U.S. Patent No. 6,273,950 by *Kitabatake* (herein referred to as *"Kitabatake"*). Applicant has amended claim 1.

Claims 4 & 5 ultimately depend from Claim 1. As explained above, Applicant asserts that Claim 1 is patentable over *Tan* in

view of *Guldi*. Applicant asserts that *Kitabatake* does not remedy the deficiencies of the *Tan* and *Guldi* cited references. Namely, *Kitabatake* does not disclose or suggest purging the at least one opening within each of the silicon carbide materials prevents the migration of the aqueous solution of inorganic acid to a base material. Consequently, Applicant asserts that claims 4 – 5 are allowable for at least the reasons given for patentability of claim 1.

C. Conclusion

Applicants do not believe that any request for Extension of Time is required, but if it is, please accept this paragraph as a Request for Extension of Time and authorization to charge the requisite extension fee to the Credit Card being submitted via EFS-web.

Applicants believe that the claims are allowable and that the application is in condition for allowance. Applicants respectfully request reconsideration and allowance of the same. Applicants do not believe that any additional fees are due regarding this Amendment. However, if any additional fees are required, please charge Deposit Account No. 04-1696.

Respectfully submitted,

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